EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

PATRICK BRADY, TED CASE, HOWARD HOLLANDER, MIKE FINUCAN AND SALLY YOUNG, individually and on behalf of all others similarly situated,	Civil Action No. 02-2917
Plaintiffs	
v.	
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL,	
Defendant.	

NOTICE AND REQUEST FOR INFORMATION

TO: ALL PERSONS EMPLOYED AS PILOTS BY TWA, INC. WHO BECAME EMPLOYED AS PILOTS BY TWA LLC, FOLLOWING AMERICAN AIRLINE'S APRIL 2001 PURCHASE OF TWA, INC.'S ASSETS.

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED IF YOU DO NOT RESPOND TO THIS REQUEST FOR INFORMATION AND PROVIDE THE DOCUMENTATION REQUESTED IN THIS NOTICE.

THIS NOTICE IS GIVEN PURSUANT TO I	FEDERAL RULE OF CIVIL PRO	OCEDURE 23 AND ORDER OF
THE UNITED STATES DISTRICT COURT	FOR THE DISTRICT OF NEW	JERSEY, ENTERED BY THE
JUDGE IN THIS CLASS ACTION ON	, 2012.	

BACKGROUND OF THE LITIGATION

- 1. The certified class action was brought on behalf of the former TWA pilots against their former union, the Air Line Pilots Association (ALPA), for breach of its duty of fair representation following the April 2001 asset purchase sale between American Airlines and TWA, Inc. The current class representatives are Patrick Brady, Ted Case, Michael Finucan, Howard Hollander, and Sally Young (referred to in this Notice as the "Class Plaintiffs").
- 2. The Class Plaintiffs, on behalf of the TWA pilots, alleged in their Second Amended Restated Complaint that ALPA failed to properly advocate their interests in the seniority integration of the TWA and American pilots because of a serious conflict of interest. The TWA pilots alleged that at the same time that ALPA was duty-bound to assist them in seniority integration negotiations with the American pilots, ALPA was engaged in extensive, undisclosed efforts to cause the more than 11,000 American Airline pilots to become members of ALPA. As a result, the Class Plaintiffs alleged, ALPA acted arbitrarily and in bad faith when it sacrificed the interests of the TWA Pilots during the pilots' seniority negotiations with the American pilots.

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- 3. Following more than five weeks of trial, on Wednesday July 13, 2011, a liability verdict was entered by the jury in this class action in the United States District Court for the District of New Jersey located in Camden, New Jersey. The jury found both that ALPA violated its duty of fair representation to the more than 2,300 TWA pilots in the class and that ALPA's violation caused tangible injury to at least some of the TWA pilots.
- 4. Following the denial of ALPA's post-trial motions, the Court opened the case for discovery on the issue of damages, which were barred by a prior order bifurcating the liability and damage phases of the case. Now that damage discovery is underway, your attorneys need information from you.
- 5. ALPA continues to deny any liability and is actively defending against the Class Plaintiffs' claims.
- 6. This Notice is not an expression of any opinion by the Court with respect to the merits of the claims or the defenses asserted in this action. This Notice is merely to advise you of the status of the litigation and that information is needed from you. Your rights may be affected if you do not respond to this notice.

REQUEST FOR DOCUMENTS

THIS REQUEST FOR DOCUMENTS IS DIRECTED ONLY TO THOSE PILOTS WHO WERE FURLOUGHED AFTER APRIL 2001. IN ORDER TO BE ELIGIBLE FOR THE RECOVERY OF DAMAGES IF PLAINTIFFS ARE SUCCESSFUL IN THEIR TRIAL ON DAMAGES, YOU MUST TAKE ACTION BY RETURNING THE ATTACHED FORMS AND REQUESTED DOCUMENTS TO THE ADDRESS BELOW NO LATER THAN _____ [INSERT DATE 60 DAYS FROM DATE OF ORDER]______, 2012. YOUR SUBMISSION OF THE REQUESTED INFORMATION DOES NOT MEAN YOU ARE ENTITLED TO DAMAGES.

- 7. The Class Plaintiffs on behalf of themselves and the Class will continue to litigate the damage phase of this case in the United States District Court for the District of New Jersey. A trial date on the issue of damages has not yet been scheduled. In order to prove their case, the law may require the Class Plaintiffs to present evidence of what each former TWA pilot actually earned from 2001 through the present. Any employment income earned by you, regardless of whether you remained employed by American Airlines or were furloughed, may be deducted from the income the Class Plaintiffs intend to prove you should have earned if you had received a fair and reasonable seniority integration.
- 8. Your attorneys have income information for those pilots who remained employed as a pilot with American Airlines and who were never furloughed. Accordingly, if you were not furloughed after April 2001, you do not need to do anything in response to this Notice.
- 9. If you were furloughed on or after April 5, 2001, following the merger between TWA, Inc. and American Airlines, you <u>must</u> produce proof of employment income from 2001 through the present. As proof of income, you must provide us with the following information:
 - a. Fill out the attached form entitled "TWA Pilot Questionnaire"; and
 - b. Sign and date the Certification Page; and
 - c. Collect federal income tax returns, along with your W2 and/or 1099 forms for each year of furlough (NOTE: The court may not accept other evidence of employment income as sufficient proof.); and

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d. Return all the above documents described in (a) through (c) above to the following address:

GREEN JACOBSON, P.C. 7733 Forsyth Blvd., Suite 700 St. Louis, MO 63105

	▼	INSERT DATE SIXTY DAYS AFTER COURT collect damages in this litigation.			
ADDITIONAL INFORMATION					
10. If you have questions about the nature of the information requested or need assistance filling of the paperwork, please contact:					
GREEN JACOBSON, P.C. (314) 862-6800					
Dated:	, 2012	BY ORDER OF THE COURT			

1)

Your name:

TWA PILOT QUESTIONNAIRE BRADY, et al. v. ALPA Docket No. 02-2917

2)	Your date of birth:
3)	The dates of your service at TWA, Inc./TWA, LLC and AA: (e.g. June 1982 - May 2003)
	* Please indicate any periods of employment by American Eagle
4)	Your final seniority number at TWA as of April 10, 2001:
5)	Your initial seniority number at AA:
6)	Date of death (if deceased):
7).	Date of retirement or early retirement (if applicable):
8)	Date(s) resigned, terminated, or lost FAA medical certificate due to disability or any other reason:
Note:	The next pages contain a series of questions specifically tailored to each particular sub-category of Pilots (e.g. furloughed and not recalled, furloughed but recalled, demoted and then furloughed, etc.). Find the page for the sub-category that best describes your situation and answer only those questions.

Furloughed and Never Recalled

- 6) If after April 5, 2001, you were furloughed, and <u>have not</u> been recalled by AA, please answer the following:
 - a) Your last rank and equipment grade:(e.g. international wide-body captain)
 - b) The date you were furloughed:
 - c) Your actual annual income received from TWA for the three years immediately before you were furloughed:
 - d) Your actual employment income earned <u>each year</u> since you were furloughed (include all income from any self-employment; do not include spousal income or investment income (such as interest, rent, capital gains, etc.). If income earned is also from secondary employment, please indicate whether you held the secondary employment prior to furlough, and the hours worked at the secondary employment both prior to and after furlough.
 - 1) 2001 -
 - 2) 2002 –
 - 3) 2003 -
 - 4) 2004 –
 - 5) 2005 –
 - 6) 2006 –
 - 7) 2007 –
 - 8) 2008 -
 - 9) 2009 –
 - 10) 2010 -
 - 11) 2011 -
 - e) For each year or partial year of furlough, please attach your federal income tax returns, along with your W2 and/or 1099 forms. **FAILURE TO SUBMIT THESE FORMS MAY AFFECT YOUR RIGHT TO RECOVER DAMAGES**.
 - f) If you held secondary employment prior to furlough which you continued to hold after furlough, please attach your W2 or 1099 forms for that secondary employment for three (3) years immediately prior to furlough.

Furloughed but Recalled

- 7) If after April 5, 2001, you were furloughed, and were thereafter recalled by AA, please answer the following:
 - a) Your last rank and equipment grade before being furloughed: (e.g. international wide-body captain)
 - b) The date you were furloughed:
 - c) Your actual annual income received from TWA for the three years immediately before you were furloughed:
 - d) Your actual employment income earned <u>each year</u> since you were furloughed (include all income from any self-employment; do not include spousal income or investment income (such as interest, rent, capital gains, etc.). If income earned is also from secondary employment, please indicate whether you held the secondary employment prior to furlough, and the hours worked at the secondary employment both prior to and after furlough.
 - 1) 2001 -
 - 2) 2002 –
 - 3) 2003 –
 - 4) 2004 –
 - 5) 2005 –
 - 6) 2006 –
 - 7) 2007 –
 - 8) 2008 –
 - 9) 2009 –
 - 10) 2010-
 - 11) 2011 -
 - e) For each year or partial year of furlough, please attach your federal income tax returns, along with your W2 or 1099 forms. **FAILURE TO SUBMIT THESE FORMS MAY AFFECT YOUR RIGHT TO RECOVER DAMAGES.**
 - f) If you held secondary employment prior to furlough which you continued to hold after furlough, please attach you W2 or 1099 forms for that secondary employment for three (3) years immediately prior to furlough.
 - g) The date you were recalled:
 - h) Did you ever decline recall? If so, what date(s) and why?

- i) Your rank and equipment grade upon being recalled:
- j) Your actual income received each year from AA since being recalled.

Demoted, Furloughed and Never Recalled

- 8) If after April 5, 2001, you were demoted (e.g. Captain → First Officer wide-body → narrow body, etc.), and then furloughed, and <u>have not</u> been recalled by AA, please answer the following:
 - a) Your rank and equipment grade when furloughed: (e.g. international wide-body captain)
 - b) The date you were furloughed:
 - c) Your rank and equipment grade immediately prior to being demoted, and the date of your demotion:
 - d) Your actual annual income received from TWA for the three years immediately before you were demoted:
 - e) Your actual income earned <u>each year</u> after you were demoted, but still flying for TWA, LLC or AA:
 - f) Your actual employment income earned <u>each year</u> since you were furloughed (include all income from any self-employment; do not include spousal income or investment income (such as interest, rent, capital gains, etc.). If income earned is also from secondary employment, please indicate whether you held the secondary employment prior to furlough, and the hours worked at the secondary employment both prior to and after furlough.
 - 1) 2001 -
 - 2) 2002 –
 - 3) 2003 -
 - 4) 2004 –
 - 5) 2005 –
 - 6) 2006 -
 - 7) 2007 –
 - 8) 2008 -
 - 9) 2009 –
 - 10) 2010 -
 - 11) 2011 -
 - g) For each year of furlough, please attach your federal income tax returns, along with your W2 or 1099 forms. FAILURE TO SUBMIT THESE FORMS MAY AFFECT YOUR RIGHT TO RECOVER DAMAGES.
 - h) If you held secondary employment prior to furlough which you continued to hold after furlough, please attach you W2 or 1099 forms for that secondary employment for three (3) years immediately prior to furlough.

Demoted, Furloughed but Recalled

- 10) If after April 5, 2001, you were demoted (e.g. Captain → First Officer wide-body → narrow body, etc.), and then furloughed, and thereafter recalled by AA, please answer the following:
 - a) Your rank and equipment grade when furloughed: (e.g. international wide-body captain)
 - b) The date you were furloughed:
 - c) Your rank and equipment grade immediately prior to being demoted, and the date of your demotion:
 - d) Your actual annual income received from TWA for the three years immediately before you were demoted:
 - e) Your actual income earned <u>each year</u> after you were demoted, but still flying for TWA, LLC or AA:
 - f) Your actual employment income earned <u>each year</u> since you were furloughed (include all income from any self-employment; do not include spousal income or investment income (such as interest, rent, capital gains, etc.), If income earned is also from secondary employment, please indicate whether you held the secondary employment prior to furlough, and the hours worked at the secondary employment both prior to and after furlough.
 - g) For each year of furlough, please attach your federal income tax returns, along with your W2 or 1099 forms. FAILURE TO SUBMIT THESE FORMS MAY AFFECT YOUR RIGHT TO RECOVER DAMAGES.
 - h) If you held secondary employment prior to furlough which you continued to hold after furlough, please attach you W2 or 1099 forms for that secondary employment for three (3) years immediately prior to furlough.
 - i) The date you were recalled:
 - j) Did you ever decline recall? If so, what date(s) and why?
 - k) Your rank and equipment grade upon being recalled:
 - 1) Your actual income received each year from AA since being recalled.

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Demoted But Never Furloughed

- 11) If after April 5, 2001, you were demoted (e.g. Captain → First Officer wide-body → narrow body, etc.), please answer the following:
 - a) Your rank and equipment grade immediately prior to being demoted:
 - b) The date of your demotion:
 - c) Your rank and equipment grade immediately after being demoted:
 - d) Your actual annual income received from TWA for the three years immediately before you were demoted:
 - e) Your actual income earned <u>each year</u> after you were demoted, but still flying for TWA, LLC or AA:

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CERTIFICATION

I have read and am familiar with the contents of the Notice accompanying this Questionnaire and I certify that the information I have set forth in the foregoing Questionnaire and in documents attached by me are true, correct and complete to the best of my knowledge.

I understand that punishment.	if any of the foregoing information provide	ded by me is untrue, I am subject to
DATED:	(signature)	
	(print name)	
	(address)	

(city, state and zip code)